

FILED

2011 DEC 30 AM 11:07

**United States District Court
For the Middle District of Tennessee**

U.S. DISTRICT COURT
MIDDLE DISTRICT OF TN

William A. Boyd

Plaintiff

v.

* General Revenue Corporation

* United Aid Fund Inc.

* Salle Mae Servicing

) CASE No.
)
) **COMPLAINT AND DEMAND FOR**
) **JURY TRIAL**
) **(Unlawful Debt Collection Practices)**
) **Demand Will Exceed \$15,000.00**

COMPLAINT

Plaintiff, William A. Boyd, individually, hereby sues Defendant(s), General Revenue Corporation, United Student Aid Funds Inc., and Salle Mae Servicing, et. al for violations of the Telephone Consumer Protection Act ("TCPA") Sec. 227., 47 USC § 227(b)(1), 47 USC § 227(a) (iii), and violations of the Fair Debt Collection Practices Act ("FDCPA") 15 USC § 1692.

PRELIMINARY STATEMENT

1. This is an action for damages and injunctive relief brought by Plaintiff against Defendant(s) for violations of the Telephone Consumer Protection Act (TCPA) Sec. 227., 47 USC § 227(b)(1), 47 USC § 227(a) (iii).

2. Upon belief and information, Plaintiff contends that many of these practices are widespread for some or all of the Defendant(s).

3. Plaintiff contends that the Defendant(s) have violated such laws by repeatedly harassing Plaintiff in attempts to collect alleged but nonexistent debt.

JURISDICTION AND VENUE

4. Jurisdiction of this Court arises under 15 U.S.C. §1681p, 47 U.S.C. §227(b)(3), 15 U.S.C. §1692k(d). United States District Court For the Middle District of Tennessee

5. Venue is proper pursuant to 28 U.S.C. §1391b and Venue in this District is proper in that the Plaintiff resides here, the Defendant(s) transact business here, and the conduct complained of occurred here.

6. This is an action for damages which exceed fifteen thousand dollars (\$15,000).

PARTIES

7. Plaintiff, William A. Boyd, is a natural person and is a resident of the State of Tennessee.

8. Plaintiff is a consumer as that term is defined by FDCPA, 15 U.S.C. §1693a(3). And according to Defendant(s), Plaintiff allegedly owes a debt.

9. Defendant(s) is a debt collector as the term is defined by FDCPA, 15 U.S.C. §1692a(6).

10. Upon information and belief Defendant(s), are foreign corporations, authorized to do business in Tennessee.

11. Upon information and belief Defendant(s), General Revenue Corporation is a New York corporation, authorized to do business in Tennessee.

FACTUAL ALLEGATIONS

12. Defendant(s), from June 29 thru October 16, 2011, violated the TCPA by calling at least 48 times using Automatic Telephone Dialing System ("ATDS") or artificial or pre-recorded voices on Plaintiff's cell phone.

13. From June 29 thru October 16, 2011, Defendant(s) violated the TCPA by **calling Plaintiff's cell phone 48 times with no prior permission given by Plaintiff.**

14. The forty two (42) phone calls from the Defendant(s) violated the TCPA by leaving recorded messages on Plaintiff's cell phone without express permission.

15. Defendant(s) place collection calls to Plaintiff's cell phone number 615.497.0640 from telephone numbers 866.632.6032 / 239.348.0452 / 866.632.4211.

**COUNT I
VIOLATIONS OF THE TELEPHONE
CONSUMER PROTECTION ACT 47 U.S.C. §227**

16. Plaintiff alleges and incorporates the information in paragraphs 1 through 15.

17. Defendant(s) has demonstrated willful or knowing non-compliance with 47 U.S.C. §227(b)(1)(A) by using an automatic telephone dialing system to call the Plaintiff's number, which is assigned to a cellular telephone service.

18. Defendant(s) has committed at least **42 documented violations of 47 U.S.C. §227(b)(1)(A)** and Plaintiff is entitled to damages of one thousand five hundred dollars (\$1,500) per violation pursuant to 47 U.S.C. §227(b)(3)(B).

19. Defendant(s) has demonstrated willful or knowing non-compliance with 47 U.S.C. §227(b)(1)(A). The last 42 (**see exhibit A**) calls are subject to treble damages pursuant to 47 U.S.C. §227(b)(3) as they were intentional. Plaintiff is registered with the Federal Do Not Call List.

20. On July 08, 2011, Defendant(s) was sent Certified Mail, requesting a **Validation Of Debt Letter and a Creditor Discloser Statement (see exhibit B)** with acknowledgment of Notary. **No Response.**

21. On August 30, 2011 a **second (2) letter was sent a "Notice of Fault and Opportunity to Cure Fault" (exhibit C)** was sent, also an acknowledgment by a Notary as an Affidavit requesting a Validation Letter, **No Response**.

22. On September 13, 2011 a **third (3) letter "Notice of Default" (exhibit D)** was sent also acknowledged by a Notary. Ten (10) additional days were giving. **No Response**. Since then Defendant(s) refuses and continues to violate 47 U.S.C. An unintentional call carries a damage amount of five hundred dollars (\$500), and an intentional call carries a damage amount of (\$1,500) per violation.

23. Defendant(s) has demonstrated willful or knowing **non-compliance with 47 U.S.C. §227(b)(1)(A) by calling the Plaintiff's number, which is assigned to a cellular telephone service**. The Plaintiff has never given Defendant(s) permission to call Plaintiffs cell phone. Plaintiff is entitled to damages of fifteen hundred dollars (\$1500) **per violation pursuant to 47 U.S.C. §227(b)(3)(B)** Plaintiff and Defendant(s) do not have an established business relationship within the meaning of 47 U.S.C. §227.

24. Defendant(s) has demonstrated willful or knowing non-compliance with 47 U.S.C. §227(b)(1)(A) by continuing to call Plaintiff forty-two (42) times after receiving the Notice Of Validation Letters with total disregard and in violation of 47 U.S.C. §227.

WHEREFORE, Plaintiff demands judgment for damages against Defendant(s) for actual or statutory damages, and punitive damages, consultant fees and costs, pursuant to 47 U.S.C. §227 .

26. Forty two (42) calls after Notice Of Validation @ fifteen hundred dollars (\$1500) per violation is sixty three thousand dollars (\$63,000).

COUNT II
VIOLATION OF FAIR DEBT COLLECTION PRACTICES ACT (FDCPA), 15 U.S.C.
§1692 BY DEFENDANTS GENERAL REVENUE CORPORATION, UNITED
STUDENT AID FUNDS INC., AND SALLIE MAE SERVICING

27. Plaintiff alleges and incorporates the information in paragraphs 1 through 26.

28. Defendant(s) placed no less than **42 telephone calls to the Plaintiff's cellular telephone after receipt of Plaintiff's Notice Of Validation Letters.** Defendant(s) knew or should have known that the phone calls made were prohibited. Such communications are prohibited by 15 U. S.C. § 1692(g)(B), U.S.C. 1692g . Plaintiff demands one thousand dollars (\$1000).

29. Defendant(s) placed no less than 42 documented telephone calls to the Plaintiff's cellular telephone after receiving written notice from the Plaintiff to cease communications. **Pursuant to 15 U.S.C. § 1692c(c), if such notice from the consumer is made by mail, notification shall be complete upon receipt.** This clearly demonstrates willful violation of U.S.C. §1692c. Plaintiff demands one thousand (\$1000).

30. Defendant(s) continued collection activity after receiving notice of dispute, and failed to provide written validation of debt before resuming collection activities, in violation of 15 U.S.C. §1692g(b). Plaintiff demands two thousand dollars (\$2,000).

31. Defendant(s) violated §1692e(10) by the use of any false representation or deceptive means to collect or attempt to collect any debt or to obtain information concerning a consumer. Plaintiff demands judgment in the amount of one thousand dollars (\$1000).

WHEREFORE, Plaintiff demands judgment for damages against Defendant(s), General Revenue Corporation, United Student Aid Funds Inc., and Salle Mae Servicing Corporation

for actual or statutory damages, punitive damages, consultant fees and costs, pursuant to FDCPA guidelines.

32. Withholding from Earnings as December 09, 2011 is eight hundred seventy nine dollars (\$879.).

33. FDCP violation Total five thousand dollars \$5,000.00.

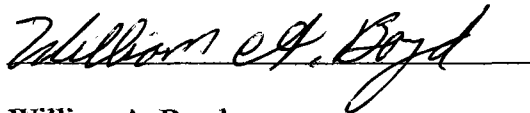
34. TCPA violations \$63,000. plus FDCP \$5,000. plus \$879. = \$68,879. Total (sixty eight thousand eight hundred seventy nine dollars).

35. Any other relief that this Honorable Court deems appropriate.

DEMAND FOR JURY TRIAL

Plaintiff hereby demands a trial by jury of all issues so triable as a matter of law.

Respectfully submitted this 9 of December 2011



William A. Boyd
73 White Bridge Rd. ste. 103-156
Nashville, Tennessee 37205
615.4970640
allenboyd308@gmail.com

Exhibit

A

DEBT COLLECTION CALL MANAGEMENT LOG

32

DATE	TIME OF CALL	CALLER ID #	CALLER/COMPANY NAME	LIST COMMENTS OF WHAT WAS SAID AND DETAILS
7-12-11	4:00 pm	866.632.6032	General Review	No message
6-29-11	10:02 am	866.632.6032	Chili's / General Review	New York Trust.com.
7-1-11	9:39 am	"	" " "	
7-5-11	7:37 pm	"	Curtis	No message
7-7-11	11:17 am	866.632.6032	General Review	No answer
7-7-11	3:37 pm	866.632.6032	Curtis	
7-11-11	3:18 pm	"	"	
7-12-11	4:26 pm	"	NONE	No message
7-12-11	4:00 pm	866.632.6032	General Review	No message
7-8	9:12 am	239 3480452	"	
7-12-11	4:00 pm	866.632.6032	General Review	No message
7-18	1:10 pm	866.632.6032	General Review	
7-27	3:18	"	"	
7-11	4:57 pm	"	"	
7-13	8:14 am	"	"	
7-13	8:15 am	"	" back to back	
7-13	6:40 pm	"	"	
7-13				

Regions Bank
 601.709.0868 / 866.632.4211 / ~~866.632.6000~~
 DEBT COLLECTION CALL MANAGEMENT LOG 239.3480452
 GEN, REV.

DATE	TIME OF CALL	CALLER ID #	CALLER/COMPANY NAME	LIST COMMENTS OF WHAT WAS SAID AND DETAILS
7-18		866.632.4211	Regions Bank	
7-27				
7-7	11:16 a	"		
	5:15 p	866.632.6032	General Revenue	
7-20	4:15 p	"	" Curtis	
7-27	6:26 p	866.632.6032	"	
7-25		866.632.4211	Regions Bank	
8-8				
8-9	12:51 p	866.632.6032	General Revenue	
8-10	1:09 p	"		
8-12	11:32 a	"		
8-16	10:20 a	"		
8-18	12:46 p	"		
8-22	2:22 p	"		
8-23	5:02 p	"		
8-24	12:53 p	"		
8-25	10:47 a	"		
8-26	8:59 a	"		

Recorded
Phone Mass

DEBT COLLECTION CALL MANAGEMENT LOG

48 Total

DATE	TIME OF CALL	CALLER ID #	CALLER/COMPANY NAME	LIST COMMENTS OF WHAT WAS SAID AND DETAILS
8-28-11	4:35 pm	8002530005	General Revenue Co.	
8-29-11	1049 AM	8002530005		
8-29-11	12:08 pm	8002530005		
8-29-11	1244 pm	8002530005		
8-29-11	1:18 pm	8002530005		
9-9-11	11:24 AM	8184508220	— ?	
9-12	11:35 AM	8184508220	General Revenue Co.	per
9-14	12:35	8666326032	Adrian	personal B1 ref
9-14	1:32 pm	8184508220	General Revenue	
9-19	1:00 pm	8666326032	Adrian	ref # 91860976
9-21	11:51 AM	8775497447	?	
9-21	4:16	8002530005	General Rev.	
9-21	5:27 pm	"	General Rev.	
9-21	8:07 pm	8779074530	Brandon	8666326032 with ref #
9-26	3:29 pm	8002530005	"	
9-26-11	4:50	8002530005	"	
9-26-11	6:40	8002530005	"	
9-26-11	7:55	"	"	

[illegible]


~~930 931 484 31 35~~ 951 AM

DEBT COLLECTION CALL MANAGEMENT LOG

[illegible]

Exhibit

B

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p>		<p>A. Signature </p> <p><input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>	
<p>1. Article Addressed to:</p> <p><i>General Revenue Company</i> <i>11100 USA PKwy #8306</i> <i>Fishers, IN 46037</i></p>		<p>B. Received by (Printed Name) <i>Jeff Woodcock</i></p>	<p>C. Date of Delivery <i>7-11-11</i></p>
		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>	
		<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>	
<p>2. Article Number (Transfer from service label)</p>		<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	
		<p>7011 0110 0001 6361 2769</p>	

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-14-1540

William A. Boyd
73 White Bridge rd. ste. 103-156
Nashville, TN. 37205
July 8, 2011

General Revenue Company
11100 USA Pkwy #8306
Fishers, ID. 46037

Account# 0085469678

Collection Department,

Thank you for your recent inquiry. This is not a refusal to pay, but a notice that your claim is disputed.

This is a request for validation made pursuant to the Fair Debt Collection Practices Act. Please complete and return the attached disclosure request form.

Please be advised that I am not requesting a "verification" that you have my mailing address, I am requesting a "validation." that is, competent evidence that I have some contractual obligation to pay you.

You should also be aware that sending unsubstantiated demands for payment through the United States Mail System might constitute mail fraud under federal and state law.

Your failure to satisfy this request within the requirements of the Fair Debt Collection Practices Act will be construed as your absolute waiver of any and all claims against me, and your tacit agreement to compensate me for costs and attorneys fees.

Sincerely,

A handwritten signature in cursive script, appearing to read "William A. Boyd".

William A. Boyd

CREDITOR DISCLOSURE STATEMENT

Name and Address of Collector (assignee): _____

Name and Address of Debtor: _____

Account Number(s): _____

What are the terms of assignment for this account? You may attach a facsimile of any records relating to such terms.

Have any insurance claims been made by any creditor or assignee regarding this account?
Yes / no

Has the purported balance of this account been used in any tax deduction claim?
Yes / no

Please list the particular products or services sold by the collector to the debtor and the dollar amount of each:

Upon failure or refusal of collector to validate this collection action, collector agrees to waive all claims against the debtor named herein and pay debtor for all costs and attorney fees involved in defending this collection action.

X _____

Authorized signature for Collector

_____ Date

Please return this completed form and attach all assignment or other transfer agreements that would establish your right to collect this debt. Your claim cannot be considered if any portion of this form is not completed and returned with the required documents. This is a request for validation made pursuant to the Fair Debt Collection Practices Act. If you do not respond as required by this law, your claim will not be considered and you may be liable for damages for continued collection efforts.

Exhibit

C

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

General Revenue Company
11100 USA PKwy #8306
Fishers, IN 46037

2. Article Number

(Transfer from service label)

7011 0110 0000 8926 4172

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

MZU

☐ Agent☐ Addressee

B. Received by (Printed Name)

Mike Tucker

C. Date of Delivery

2/1/11

D. Is delivery address different from item 1? ☐ YesIf YES, enter delivery address below: ☐ No

3. Service Type

☒ Certified Mail☐ Express Mail☐ Registered☒ Return Receipt for Merchandise☐ Insured Mail☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

**NOTICE OF FAULT AND
OPPORTUNITY TO CURE FAULT**

**NOTICE TO AGENTS IS NOTICE TO PRINCIPALS
NOTICE TO PRINCIPALS IS NOTICE TO AGENTS
Applicable to all Successors and Assigns
SILENCE IS ACQUIESCENCE**

AFFIDAVIT

State: Tennessee)
County: Davidson) SS

I, W. Allen Boyd, Affiant herein, state under penalties of perjury that Affiant is competent to be a witness and that the facts contained herein are true, correct, complete, and not misleading, to the best of Affiant's personal knowledge.

Date: August 30, 2011

Certified Mail #: 70110110000089264172

To: General Revenue Company
11100 USA Pkwy. #8306
Fishers, ID. 46037

From: W. Allen Boyd
73 White Bridge Rd. ste. 103-156
Nashville, Tennessee 37205

the united states of America

Re: Account# 0085469678

NOTICE OF FAULT AND OPPORTUNITY TO CURE FAULT

Dear Collection Department,

I, W. Allen Boyd, Affiant herein, served Respondent a Validation of Debt Letter and enclosed a Creditor Disclosure Statement for you to sign and return to Affiant within **thirty (30) days** of receipt of Validation of Debt Letter. Said Validation of Debt Letter is incorporated herein by reference as if fully incorporated herein.

Respondent was noticed that Respondent's failure to sign the Creditor Disclosure Statement and return it to Affiant in a timely manner pursuant to the Fair Debt Collection Practices Act would be Respondent's agreement to all of Affiant's claims made in Affiant's Validation of Debt Letter by *TACIT PROCURATION, Stare Decisis*.

Respondent failed to timely sign and return the Creditor Disclosure Statement to Affiant.

Respondent is in Fault.

Affiant is granting Respondent **ten (10) more days** to provide Affiant with the signed Creditor Disclosure Statement served on Respondent.

Respondent's failure to timely provide Affiant with the signed Creditor Disclosure Statement will place Respondent in **Default**, and Respondent's Default will be an agreement and stipulation to all the assertions, claims, and agreements in Affiant's "Notice of Claim" through *TACIT PROCURATION, Stare Decisis*, and the doctrine of ESTOPPEL BY SILENCE will apply.

Respondent's **Default** is Respondent's agreement with Affiant that Respondent will fully discharge the alleged debt and will be liable to Affiant for any adverse reporting to a Credit Reporting Agency.

Further Affiant says not.

Respectfully submitted under my hand this 30 day of August, 2011 A.D., With
Reservation of All Our Rights at UCC 1-308.

By:


Name, Affiant

ACKNOWLEDGEMENT OF NOTARY

State/Commonwealth of Tennessee)
County of Davidson) ss:
)

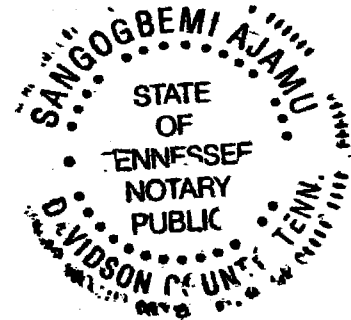
On this the 30th day of August, 2011, before me,
Sangosbemi Ajamu, the undersigned Notary Public, personally appeared
W. Allen Boyd, personally known to me (or proved to me on the basis of
satisfactory evidence) to be the person(s) whose name(s) is/are subscribed to the within instrument,
NOTICE OF FAULT AND OPPORTUNITY TO CURE FAULT, and acknowledged to me that
he/she/they executed the same for the purposes therein stated.

WITNESS my hand and official seal,

Sangosbemi Ajamu
Signature of Notary Public

Sangosbemi Ajamu
Printed Name of Notary Public

My Commission Expires: 4th January, 2014



SEAL/STAMP

Exhibit

D

7010 3090 0000 3973 5355

U.S. Postal Service™ CERTIFIED MAIL™ RECEIPT (Domestic Mail Only; No Insurance Coverage Provided)	
For delivery information visit our website at www.usps.com	
OFFICIAL USE	
Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$
Postmark Here	
SEP 13 2011	
NASHVILLE, TN	
U.S. PS 37228	
Sent To General Revenue Company	
Street, Apt. No., or PO Box No. 11100 USA PKWY #8306	
City, State, ZIP+4 Fishers, ID. 46037	
PS Form 3800, August 2006 See Reverse for Instructions	

NOTICE OF DEFAULT

NOTICE TO AGENTS IS NOTICE TO PRINCIPALS
NOTICE TO PRINCIPALS IS NOTICE TO AGENTS
Applicable to all Successors and Assigns
SILENCE IS ACQUIESCENCE

AFFIDAVIT

State: Tennessee)
County: Davidson) SS

I, W. Allen Boyd, Affiant herein, state under penalties of perjury that Affiant is competent to be a witness and that the facts contained herein are true, correct, complete, and not misleading, to the best of Affiant's personal knowledge.

Date: September 13, 2011

Certified Mail #: 7010 3090 0000 3973 5355

To: General Revenue Company
11100 USA Pkwy. #8306
Fishers, ID. 46037

From: W. Allen Boyd
73 White Bridge Rd. ste. 103-156
Nashville, Tennessee 37205

the united states of America

Re: Account # 0085469678

NOTICE OF DEFAULT

Dear Collection Department

I, W. Allen Boyd, Affiant herein, served Respondent a Validation of Debt Letter and a Creditor Disclosure Statement for Respondent to sign and return to Affiant within **thirty (30) days** to dispute said claims or admit said claims by silence. Said Validation of Debt Letter and Creditor Disclosure Statement are incorporated herein by reference as if fully incorporated herein.

Respondent failed to sign and timely return the Creditor Disclosure Statement to Affiant to validate the claims.

Respondent was in Fault.

Affiant then served Respondent with a "Notice of Fault and Opportunity to Cure Fault", incorporated herein by reference as if fully incorporated herein, and granted Respondent **ten (10) more days** to cure said Fault by providing Affiant with the signed Creditor Disclosure Statement previously served on Respondent.

Respondent again failed to provide Affiant with the signed Creditor Disclosure Statement previously served on Respondent.

Respondent is now in **Default** and Respondent's Default, pursuant to the Validation of Debt Letter, created *tacit agreements* between Affiant and Respondent.

Respondent's **Default** created **agreements** between Respondent and Affiant that the alleged debt referenced by the above-numbered account is now fully discharged, Respondent **will not** turn over the alleged debt for collections and **will not** make adversary reports to a Credit Reporting Company without incurring substantial financial liability.

With this Notice of Default Affiant has exhausted Affiant's Administrative Remedies.

DEMAND TO PROVIDE NOTICE OF DISCHARGE

Affiant is making demand on Respondent to fully discharge the alleged debt or in the alternative, contact Affiant in writing via Notary Public at address shown on the Certificate of Service page to resolve the matter and show cause why Affiant should not bring Respondent to court for failure to fully disclose the true nature of the alleged contract, violation of the contract, violation of the Truth in Lending Act, failure to provide consideration by failure to perform on the value of the contract, possible violation of the usury laws, and using the mail to collect on an unsubstantiated debt, and possible fraud, and other violations.

Further Affiant says not.

Respectfully submitted under my hand this 13 day of September, 2011 A. D. with
Reservation of all Our Rights at UCC 1-308.

By: W. Allen Byrd
Name, Affiant

ACKNOWLEDGEMENT OF NOTARY

State/Commonwealth of Tennessee)
County of Davidson) ss:
)

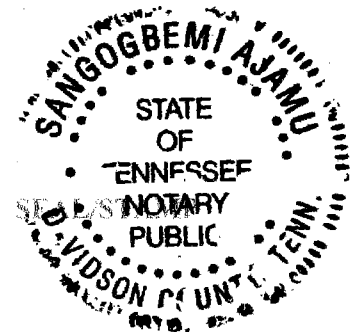
On this the 13th day of September, 2011, before me, Sangogbeni Ajamu, the undersigned Notary Public, personally appeared W. Allen Boyd, personally known to me (or proved to me on the basis of satisfactory evidence) to be the person(s) whose name(s) is/are subscribed to the within instrument, **NOTICE OF DEFAULT**, and acknowledged to me that he/she/they executed the same for the purposes therein stated.

WITNESS my hand and official seal,

Sangogbeni Ajamu
Signature of Notary Public

Sangogbeni Ajamu
Printed Name of Notary Public

My Commission Expires: 6th January, 2014



**AFFIDAVIT OF NOTARY PRESENTMENT
CERTIFICATE OF SERVICE**

STATE OF TENNESSEE)
) ss.
COUNTY OF Davidson)

Be it known that I, Sangobemi Ajamu, NOTARY, a duly empowered notary public, in and for the STATE OF TENNESSEE, COUNTY OF Davidson, a third party and not a party to the matter for the sole purpose certifying a response or want thereof, at the request of W. Allen Boyd, did present on this day the following documents to wit:

- 1) Notice (5 Pages);
- 2) Reference copy of this Notary's Certificate of Service (1 page) (Original on File),

I hereby certify that after reviewing the documents, I placed the said documents with the U.S. Postal Service, Registered/Certified 7810 3890 0840 3973 5358 Return Receipt, prepaid and addressed to:

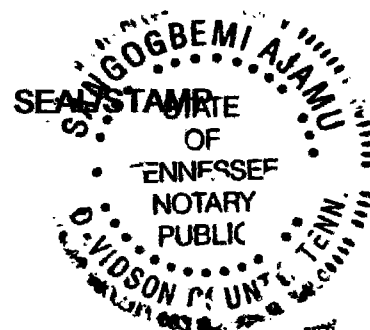
General Reserve Company
11100 USA Pkwy # 8306
Fishers, IN
46037

Please send ALL correspondence to
Sangobemi Ajamu, Notary Public
2712 Tucker Rd
Nashville, TN 37218

I have hereunto set my hand and seal of office on this 13th day of September, 2011

Sangobemi Ajamu
-Notary Public

My Commission Expires: 6th January, 2014



LEGAL NOTICE

The Certifying Notary is an independent contractor and not a party to this claim. In fact the Certifying Notary is a Federal Witness Pursuant to TITLE 18, PART I, CHAPTER 73, SEC. 1512. *Tampering with a witness, victim, or an informant.* The Certifying Notary also performs the functions of a quasi-Postal Inspector under the Homeland Security Act by being compelled to report any violations of the U.S. Postal regulations as an Officer of the Executive Department. Intimidating a Notary Public under Color of Law is a violation of Title 18, U.S. Code, Section 242, titled "Deprivation of Rights Under Color of Law," which primarily governs police misconduct investigations. This Statute makes it a crime for any person acting under the Color of Law to willfully deprive any individual residing in the United States and/or United States of America those rights protected by the Constitution and U.S. laws.

AFFIDAVIT OF NOTARY PRESENTMENT
CERTIFICATE OF SERVICE

STATE OF TENNESSEE)

COUNTY OF Davidson)

ss.

Be it known that I, Sangobemi Ajamu, NOTARY, a duly empowered notary public, in and for the STATE OF TENNESSEE, COUNTY OF Davidson, a third party and not a party to the matter for the sole purpose certifying a response or want thereof, at the request of William Allen Boyd, did present on this day the following documents to wit:

- 1) Notice (2 Pages);
- 2) Reference copy of this Notary's Certificate of Service (1 page) (Original on File),
- 3) Complaint (7 pages) 4) Exhibits (22 pages)

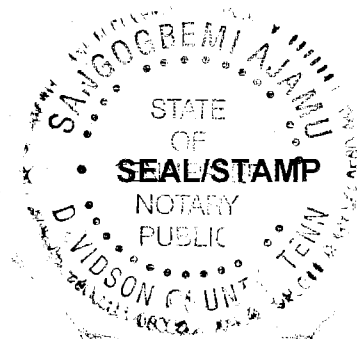
I hereby certify that after reviewing the documents, I placed the said documents with the U.S. Postal Service, Registered/Certified Mail # _____
Return Receipt, prepaid and addressed to:

Please send ALL correspondence to:
Sangobemi Ajamu, Notary Public
2712 Tucker Rd
Nashville, TN 37218

I have hereunto set my hand and seal of office on this 9th day of December, 2011

Sangobemi Ajamu, RN
~Notary Public

My Commission Expires: 6 January, 2014



LEGAL NOTICE

The Certifying Notary is an independent contractor and not a party to this claim. In fact the Certifying Notary is a Federal Witness Pursuant to TITLE 18, PART I, CHAPTER 73, SEC. 1512. *Tampering with a witness, victim, or an informant.* The Certifying Notary also performs the functions of a quasi-Postal Inspector under the Homeland Security Act by being compelled to report any violations of the U.S. Postal regulations as an Officer of the Executive Department. Intimidating a Notary Public under Color of Law is a violation of Title 18, U.S. Code, Section 242, titled "Deprivation of Rights Under Color of Law," which primarily governs police misconduct investigations. This Statute makes it a crime for any person acting under the Color of Law to willfully deprive any individual residing in the United States and/or United States of America those rights protected by the Constitution and U.S. laws.

ACKNOWLEDGEMENT OF NOTARY

State/Commonwealth of TENNESSEE)

) ss:

County of DAVIDSON)

On this the 9th day of December, 2011, before me,
Sangogbemi Ajamu, the undersigned Notary Public, personally appeared
William Allen Boyd, personally known to me (or proved to me on the basis of
satisfactory evidence) to be the person(s) whose name(s) is/are subscribed to the within
instrument, **NOTICE OF PENDING LAWSUIT, COMPLAINT AND DEMAND FOR
JURY TRIAL**, and acknowledged to me that he/she/they executed the same for the purposes
therein stated.

WITNESS my hand and official seal,

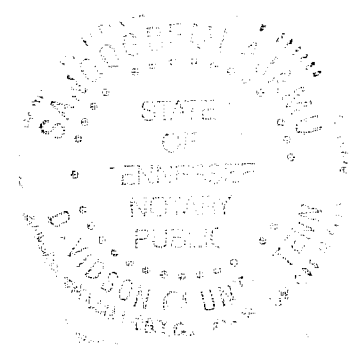
Sangogbemi Ajamu, RN

Signature of Notary Public

Sangogbemi Ajamu

Printed Name of Notary Public

My Commission Expires: 6th January, 2014



SEAL/STAMP